



North America Europe Asia

1901 L Street, NW
Washington, DC 20036
T +1 202 282 5000
F +1 202 282 5100

ABBE DAVID LOWELL
Partner
202-282-5875
ADLowell@winston.com

September 15, 2022

VIA ECF

Hon. Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Al Malik Alshahhi, et. al., No. 1:21-cr-00371 (BMC)

Dear Judge Cogan:

I write on behalf of Defendants Thomas J. Barrack, Jr. and Matthew Grimes in response to the Court's order regarding the request from in-house press corps. *See* Dkt. No. 225 (Order). Defendants have no objection to the media's request, with some clarifications. We would want to reserve the first row(s) in the courtroom for our assistants, family, and friends and that should not be a problem for the space that the media has requested. With respect to individual voir dire, generally there is no objection, but Defendants defer to the Court if a juror wants a sidebar or some privacy not to have a member of the media standing there as well. In these instances, it would seem access to the transcript would be consistent with the law and their request. Thank you for your consideration.

Respectfully submitted,

/s/ Abbe David Lowell

Abbe David Lowell
WINSTON & STRAWN LLP
1901 L Street, N.W.
Washington, D.C. 20036
Tel: (202) 282-5875
Fax: (202) 282-5100
ADLowell@winston.com

Counsel for Defendant Matthew Grimes

WINSTON
& STRAWN
LLP

September 15, 2022
Page 2

/s/ Randall W. Jackson

Randall W. Jackson

Michael S. Schachter

WILLKIE FARR & GALLAGHER LLP

787 Seventh Avenue

New York, NY 10019

Tel: (212) 728-8000

Fax: (212) 728-8111

rjackson@willkie.com

mschachter@willkie.com

James A. Bowman

O'MELVENY & MYERS LLP

400 South Hope Street, 18th Floor

Los Angeles, CA 90071

Tel: (213) 430-6000

Fax: (213) 430-6407

jb Bowman@omm.com

Counsel for Defendant Thomas J. Barrack, Jr.

cc: All counsel of record (via ECF)